UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

WI-LAN INC., Plaintiff, v. **LG ELECTRONICS, INC. and LG ELECTRONICS U.S.A., INC.,** Defendants.	**10 Civ. 432 (LAK) (AJP)**

DECLARATION OF JEFFREY G. MOTE IN SUPPORT OF DEFENDANTS' RESPONSE TO PLAINTIFF'S OBJECTION UNDER FED. R. CIV. P. 72(a)

I, Jeffrey G. Mote, declare as follows:

1. I am an attorney at Greenberg Traurig, LLP, attorneys for Defendants and Counterclaim-Plaintiffs LG Electronics, Inc. and LG Electronics U.S.A., Inc. (collectively "LG" or "Defendants") in the above-captioned matter. I have personal knowledge of the facts discussed herein and, if called to testify, I would and could competently testify to those facts. I respectfully submit this Declaration in support of Defendants' Response to Plaintiff's Objection Under Fed. R. Civ. P. 72(a).

2. Attached hereto as **Exhibit 1** is a true and correct copy of a Wi-LAN production document Bates numbered WL0426961–WL0426963 [FILED UNDER SEAL].

3. Attached hereto as **Exhibit 2** is a true and correct copy of a Wi-LAN production document Bates numbered WL0426964–WL0426965 [FILED UNDER SEAL].

4. Attached hereto as **Exhibit 3** is a true and correct copy of excerpts from the transcript of the December 30, 2010, hearing before Magistrate Judge Peck.

5. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts from the December 3, 2010, deposition of Wi-LAN's former President Najmul Siddiqui.

6. Attached hereto as **Exhibit 5** is a true and correct copy of excerpts from the transcript of the July 22, 2010, hearing before Magistrate Judge Peck.

7. Attached hereto as **Exhibit 6** are true and correct copies of two discovery letters from LG counsel Richard Harris to Magistrate Judge Peck dated December 29, 2010.

8. Attached hereto as **Exhibit 7** is a true and correct copy of excerpts from Defendants' First Set of Requests for Production of Documents and Things to Plaintiff (Nos. 1-113), dated May 14, 2010.

9. Attached hereto as **Exhibit 8** is a true and correct copy of a letter from Wi-LAN counsel Matthew Holohan to LG counsel Jeffrey G. Mote dated June 1, 2010.

10. Attached hereto as **Exhibit 9** is a true and correct copy of an email letter from LG counsel Jeffrey G. Mote to Wi-LAN counsel Matthew Holohan dated June 9, 2010.

11. Attached hereto as **Exhibit 10** is a true and correct copy of an email letter from Wi-LAN counsel Matthew Holohan to LG counsel, dated September 1, 2010.

12. Attached hereto as **Exhibit 11** is a true and correct copy of an email letter from LG counsel Matthew Levinstein to LG counsel, dated October 4, 2010.

13. Attached hereto as **Exhibit 12** is a true and correct copy of an email letter from Wi-LAN counsel Matthew Holohan to LG counsel, Matthew Levinstein, dated October 7, 2010.

14. Attached hereto as **Exhibit 13** is a true and correct copy of a facsimile letter from Bereskin & Parr to LG counsel, dated October 19, 2010.

15. Attached hereto as **Exhibit 14** is a true and correct copy of a letter from LG counsel Richard Harris to Magistrate Judge Peck dated October 19, 2010.

16. Attached hereto as **Exhibit 15** is a true and correct copy of a letter from LG counsel Jeffery G. Mote to Magistrate Judge Peck dated October 21, 2010.

17. Attached hereto as **Exhibit 16** is a true and correct copy of excerpts from the transcript of an October 29, 2010, hearing before Magistrate Judge Peck.

18. Attached hereto as **Exhibit 17** is a true and correct copy of a letter from Wi-LAN counsel Matthew Holohan to LG counsel, dated November 3, 2010.

19. Attached hereto as **Exhibit 18** is a true and correct copy of a letter from Wi-LAN counsel Matthew Holohan to LG counsel Eric Maiers dated November 5, 2010.

20. Attached hereto as **Exhibit 19** is a true and correct copy of an email letter from Wi-LAN counsel Matthew Holohan to LG counsel dated November 8, 2010, forwarding links to a supplemental production of Wi-LAN documents bates labeled WL0426756-WL0426759 and WL0426760-WL0432203—the latter of which contained the Meeting Notes.

21. Attached hereto as **Exhibit 20** is a true and correct copy of a letter from Wi-LAN counsel Matthew Holohan to LG counsel Eric Maiers dated November 15, 2010.

22. Attached hereto as **Exhibit 21** is a true and correct copy of excerpts from a hearing before Magistrate Judge Peck on November 16, 2010.

23. Attached hereto as **Exhibit 22** is a true and correct copy of a letter from LG counsel Eric Maiers to Wi-LAN counsel Matthew Holohan dated November 21, 2010.

24. Attached hereto as **Exhibit 23** is a true and correct copy of excerpts from the November 24, 2010, 30(b)(6) deposition of Bill Middleton on behalf of Wi-LAN.

25. Attached hereto as **Exhibit 24** is a true and correct copy of excerpts from the December 7, 2010, 30(b)(6) deposition of Tim Collings on behalf of Wi-LAN.

26. Attached hereto as **Exhibit 25** is a true and correct copy of excerpts from the December 2, 2010, 30(b)(6) deposition of Wi-LAN's former Director of Communications, Murray Eldon.

27. Attached hereto as **Exhibit 26** is a true and correct copy of a letter from LG counsel Matthew Levinstein to Wi-LAN counsel Richard Meyer dated December 10, 2010.

28. Attached hereto as **Exhibit 27** is a true and correct copy of a letter from Wi-LAN counsel Matthew Holohan to LG counsel Matthew Levinstein dated December 14, 2010.

29. Attached hereto as **Exhibit 28** is a true and correct copy of a letter from LG counsel Matthew Levinstein to Wi-LAN counsel Matthew Holohan dated December 15, 2010.

30. Attached hereto as **Exhibit 29** is a true and correct copy of a status report letter from LG counsel Richard Harris to Magistrate Judge Peck dated December 15, 2010.

31. Attached hereto as **Exhibit 30** are true and correct copies of two letters from LG counsel Richard Harris to Magistrate Judge Peck dated December 29, 2010.

I declare under penalty of perjury under the laws of the United States that the foregoing information is true and correct to the best of my knowledge, information and belief.

Dated: January 24, 2011

/s/ Jeffrey G. Mote
Jeffrey G. Mote